

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

NSTAR Electric/
NSTAR Gas Company

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D.T.E. 02-78

MOTION FOR LEAVE TO FILE REPLY COMMENTS

Pursuant to 220 C.M.R. § 1.04(5), Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company d/b/a NSTAR Electric, and NSTAR Gas Company, (collectively, “NSTAR” or the “Company”) hereby move the Department of Telecommunications and Energy (the “Department”) for leave to file reply comments in the above-captioned proceeding. In support of its Motion, the Company states the following:

1. On November 27, 2002, NSTAR filed a request for an accounting ruling related to pension and post-retirement benefits other than pensions.
2. Subsequently, the Department issued a Notice wherein it required interested persons to file comments on the Company’s proposal by December 9, 2002. Upon the joint request of NSTAR and the Attorney General, the date for submission of comments was deferred until December 13, 2002. The Department’s Notice did not establish a date for the Company to submit Reply Comments.
3. On December 13, 2002, the Attorney General submitted comments.

4. In his comments, the Attorney General raised issues concerning the Company's petition that are either erroneous or require clarification by the Company.
5. In an effort to provide the Department with accurate information about its petition, good cause exists for allowing the Company to respond to the Attorney General's comments. Allowing the Company to file its Reply Comments (attached hereto) will not delay the proceeding.

WHEREFORE, for the reasons stated above, the Company respectfully requests that this Motion for Leave to File Reply Comments be granted.

Respectfully submitted,

**NSTAR ELECTRIC/NSTAR GAS
COMPANY**

By its attorney,

Robert J. Keegan, Esq.
Keegan, Werlin & Pabian, LLP
21 Custom House Street
Boston, MA 02110
(617) 951-1400 (telephone)
(617) 951-1354 (facsimile)

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